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*Counsel for Defendant Federal Savings Bank*

**IN THE UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

PROFICIO MORTGAGE VENTURES.  
LLC,

Plaintiff,

v.

THE FEDERAL SAVINGS BANK,

Defendant.

Case No. 2:15-CV-510-RFB-(VCF)

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE  
TO FILE RESPONSES TO  
MOTIONS FOR SUMMARY  
JUDGMENT**

(First Request)

Plaintiff, Proficio Mortgage Ventures, LLC (“Proficio”), and Defendant, The Federal Savings Bank (“TFSB”), by and through their undersigned attorneys, hereby stipulate and agree as follows:

**I. INTRODUCTION**

The parties respectfully request a 14 day extension of the deadline to file responses to the pending Motions for Summary Judgment, which were filed on January 27, 2017 (Dkts. 89 and 90). Pursuant to Local Rule of Civil Practice 6-1, the parties state as follows:

1 **II. REASONS FOR EXTENSION**

2 The parties have filed lengthy Summary Judgment Motions that address issues central to  
3 the case. The discovery record in this case is considerable, as the parties have conducted over 20  
4 depositions and have produced over 58,000 pages of documents. In light of the importance and  
5 complexity of the pending Motions for Summary Judgment, and the considerable discovery record  
6 that must be reviewed in preparing responses to the Motions, as well as other professional  
7 obligations of counsel (referenced below), the parties respectfully request a 14 day extension to the  
8 deadline to file responses to the Motions for Summary Judgment. Such extension is not sought for  
9 purposes of delay, but rather to provide the parties with adequate time to prepare responses to the  
10 pending Motions for Summary Judgment.

11 The other obligations of counsel referenced above include Defendant's counsel's need to  
12 prepare responses to dispositive motions in other cases, the need to prepare an appellant brief, and  
13 issues involving requests for emergency injunctive relief.

14 **III. PROPOSED AMENDED SCHEDULE**

15 In light of the above, the parties stipulate and agree, subject to this Court's approval, to the  
16 following schedule:

- 17 A. Responses to Motions for Summary Judgment. The deadline to file Responses to  
18 the pending Motions for Summary Judgment (Dkts. 89 and 90) shall be extended to  
19 **March 3, 2017.**

20 The Parties represent that this stipulation is sought in good faith, is not interposed for delay,  
21 and is not filed for an improper purpose.

22  
23 Respectfully submitted this 15th day of February, 2017.  
24  
25  
26  
27  
28

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*Counsel for Defendant Federal Savings Bank*

14 **ORDER**

15 **IT IS SO ORDERED.**

16  
17 Dated: February 16, 2017

18   
19 RICHARD F. BOULWARE, II  
United States District Judge

20 SUBMITTED BY:

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22 FARKAS & BROCATO LLP

23  
24 By: /s Steven H. Leech

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